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April 13, 2011

Via ECF and Federal Express

Hon. Dennis M. Cavanaugh, U.S.D.J.  
U.S. Post Office & Court House Building  
Room 451  
Federal Square  
P.O. Box 999  
Newark, New Jersey 07101-0999

  
**RECEIVED**

APR 14 2011

DENNIS M. CAVANAUGH  
U.S. DISTRICT JUDGE

**Re: Largie v. TCBA Watson Rice, LLP, et al.**  
**Case No. 2:10-cv-05533(DMC)(JAD)**  
**Motion Hearing Date: April 21, 2011**

Dear Judge Cavanaugh:

This office represents the defendants in connection with the above-captioned matter. On February 18, 2011, we filed a motion to dismiss or for partial summary judgment, returnable on March 21, 2011. (Docket Entry No. 10.) The Court determined that the motion was to be decided on the papers. (Docket Entry dated Feb. 18, 2011.)

On March 1, 2011, the parties filed a Stipulation adjourning the motion. (Docket Entry No. 11.) On March 18, 2011, the Court "So Ordered" the Stipulation and scheduled the return date of the motion for April 21, 2011 with the motion to be decided on the papers. (Docket Entry No. 12.)

The plaintiff's opposition papers were due on Thursday, April 7, 2011 but were not filed at that time. Today, April 13, 2011, nearly a week late, the plaintiff finally filed and served his opposition papers. Upon receiving the plaintiff's late (and voluminous) opposition papers, I contacted plaintiff's counsel, Nelson Canter, Esq., to inquire as to why the opposition was late. It was at that time that Mr. Canter first advised me that his opposition had been filed late because there had been a death in his family last week. After expressing my condolences, I requested Mr. Canter's consent to two week adjournment of the motion so the defendants would have a chance to file reply papers at least a week before the return date. Mr. Canter consented to my adjournment request. Without the adjournment of the motion, the defendants' reply papers would otherwise be due tomorrow.

**DUNN LAMBERT**

DUNN LAMBERT LLC

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In light of the foregoing and to afford the defendants an opportunity to file reply papers, I respectfully request that the motion be adjourned until May 5, 2011.

Thank you for your consideration of this request.

Respectfully,

DUNN LAMBERT, L.L.C.



HARLAN L. COHEN

HLC:jac

Cc: Hon. Joseph A. Dickson, U.S.M.J. (via ECF and Lawyers Service)  
Nelson E. Canter, Esq. (via ECF and email)

SO ORDERED

4/14/11



DENNIS M. CAVANAUGH, U.S.D.J.

DUNN LAMBERT